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September 16, 2022

VIA ECF

The Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: *Crespo v. Sackman Enterprises, Inc. Et al*
Civil Case No.: 22-cv-02146 (KPF)(OTW)

Dear Judge Failla:

This joint letter is submitted on behalf of Plaintiffs and Defendants in the above-captioned action. The parties seek extensions of time and an adjournment, as set forth below, since the parties have scheduled a mediation session on October 12, 2022. The parties previously mediated on May 17, 2022, and thereafter the Court permitted Plaintiffs until August 31, 2022 to file an Amended Complaint, which they did. Now, in light of the parties' renewed attempt at resolving the case through mediation, the parties request the Court adopt the below proposed schedule:

- Extend the date for all Defendants to respond to the Amended Complaint to October 21, 2022.
- Extend the date for the parties to submit a Proposed Case Management Plan & Scheduling Order from September 29, 2022 to October 29, 2022.
- Adjourn the October 4, 2022, Initial Pretrial Conference to a date after October 29, 2022.

We thank Your Honor for your attention to this matter.

Respectfully submitted,

JACKSON LEWIS P.C.

/s/ Brian J. Shenker

Brian J. Shenker

BJS/

cc: Karen Kithan Yau, Getman, Sweeney, & Dunn, Counsel for Plaintiffs (via ECF)

Anamaria Segura, New York Legal Assistance Group, Counsel for Plaintiffs (via ECF)

4884-1913-8867, v. 1

Application GRANTED. Defendants shall respond to the Amended Complaint by **October 21, 2022**. The initial pretrial conference scheduled for October 4, 2022, is hereby **ADJOURNED** to **November 15, 2022, at 3:00 p.m.** The parties shall submit a joint letter and proposed case management plan in line with the Court's individual rules by **November 10, 2022**.

The Clerk of Court is directed to terminate the pending motion at docket entry 39.

Dated: September 16, 2022
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE